

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

IN RE: JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES PRACTICES
AND PRODUCTS LIABILITY
LITIGATION

Civil Action No. 3:16-md-2738-FLW-LHG

MDL No. 2738

This Document Relates to: All Plaintiffs

CROSS-NOTICE OF VIDEOTAPED DEPOSITION OF
FRED POOLEY, PH.D.

PLEASE TAKE NOTICE that, in connection with the *In Re LAOSD Asbestos Litigation*, in the Superior Court of the State of California for the County of Los Angeles, Defendants Johnson & Johnson and Johnson & Johnson Consumer Inc. (“Johnson & Johnson Defendants”), pursuant to the Federal and California Rules of Civil Procedure, cross-notice the videotaped deposition upon oral examination of **Fred Pooley, Ph.D.**, before a person duly authorized to administer oaths, on **December 13-14, 2017 at 10:00 a.m. (GMT) at Cardiff Bay Center Falcon Drive, Cardiff Bay, Cardiff, Mid Glamorgan, CF10 4RU, United Kingdom**, pursuant to *Defendants Johnson & Johnson and Johnson & Johnson Consumer Inc.’s Notice of Taking Videotaped Deposition of Fred Pooley, Ph.D.*, as

served and attached as Exhibit “A” hereto. A second camera will be placed on counsel examining the witness in accordance with the Federal and California rules.

The deposition will be conducted pursuant to the provisions of the California Rules of Civil Procedure. You may appear and examine the witness following completion of the *In Re LAOSD Asbestos Litigation* deposition.

Dated: November 27, 2017

s/Susan M. Sharko

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*Johnson and Johnson & Johnson
Consumer Companies, Inc.,
now known as Johnson & Johnson
Consumer Inc.*

EXHIBIT A



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Attorneys for Defendants

JOHNSON & JOHNSON and

JOHNSON & JOHNSON CONSUMER INC.

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

IN RE LAOSD ASBESTOS LITIGATION

Case No. JCCP 4674

**DEFENDANTS JOHNSON & JOHNSON
 AND JOHNSON & JOHNSON
 CONSUMER INC.'S NOTICE OF
 TAKING VIDEOTAPED DEPOSITION
 OF FRED POOLEY, PH.D.**

Date: December 13-14, 2017

Time: 10:00 a.m. GMT

Location: Cardiff Bay Center
 Falcon Drive, Cardiff Bay,
 Cardiff, Mid Glamorgan,
 CF10 4RU, United Kingdom

*[Assigned to the Honorable Steven J. Kleinfeld,
 Department 324]*

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that defendants JOHNSON & JOHNSON and JOHNSON &
 JOHNSON CONSUMER INC. will take the videotaped deposition of FRED POOLEY, PH.D.
 ("deponent") pursuant to California Code of Civil Procedure sections 2020.010 and 2025.010.

The deposition will be taken on **December 13-14, 2017 at 10:00 a.m. GMT** at Cardiff Bay

1 Center Falcon Drive, Cardiff Bay, Cardiff, Mid Glamorgan, CF10 4RU, United Kingdom. Due
2 to the deponent's age, said deposition will proceed 3.5 hours each day for a total of seven hours
3 pursuant to California Code of Civil Procedure section 2025.290. Said deposition will be taken
4 before a notary public/certified shorthand reporter authorized to administer oaths in the State of
5 California who is present at the specified time and place.

6 PLEASE TAKE FURTHER NOTICE that, pursuant to California Code of Civil
7 Procedure sections 2025.220(a)(5) and 2025.330 *et seq.*, said deposition may be videotaped.

8 Said deposition will be taken for the purposes of discovery, for use at trial and for all
9 other permissible purposes under the California Code of Civil Procedure. Notice has been
10 served on all parties.

11 DATED: November 22, 2017

KING & SPALDING LLP

12
13 By: 

Alexander G. Calfo
Julia E. Romano
Attorneys for Defendants
JOHNSON & JOHNSON and
JOHNSON & JOHNSON CONSUMER
INC.

PROOF OF SERVICE

Ann Patrice Gibbons, et al. v. Axia Acquisition Corporation, et al.
LASC Case No. JCCP 4674 / BC644854

I, the undersigned, declare: I am a citizen of the United States, over 18 years of age and not a party to the within action. I am employed in the County of Los Angeles, State of California; my business address is 633 W. 5th Street, Suite 1700, Los Angeles, CA 90071.

On the date specified below, I served a copy of the foregoing document described as:

DEFENDANTS JOHNSON & JOHNSON AND JOHNSON & JOHNSON CONSUMER INC.'S NOTICE OF TAKING VIDEOTAPED DEPOSITION OF FRED POOLEY, PH.D.

on the interested parties in this action by causing a true copy thereof to be distributed as follows:

[X] BY ELECTRONIC SERVICE VIA FILE & SERVEXPRESS: File & ServeXpress for service on all counsel of record by electronic service pursuant to the Order Authorizing Electronic Service and pursuant to California Code of Civil Procedure § 1010.6 and California Rules of Court 2060(c). The transmission was reported as complete without error.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on November 22, 2017, at Los Angeles, California.



Julia E. Romano

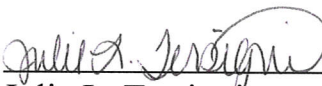
CERTIFICATION OF SERVICE

I hereby certify that I have, on this 27th day of November, 2017, caused the foregoing Cross-Notice of Oral and Videotaped Deposition of Fred Pooley, Ph.D. to be served on the following persons via ECF and Electronic Mail:

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Julie L. Tersigni